

Before the Independent Hearings Panel
At Christchurch City Council

Under the	Resource Management Act 1991 (RMA or Act)
In the matter of	proposed private plan change 23 (PC 23) to the Christchurch District Plan
And	LMM Investments 2012
	Applicant

Joint Witness Statement for WASTEWATER and WATER SUPPLY

13th May 2026

Applicant's solicitor:
Jo Appleyard / Tallulah Parker
Anderson Lloyd
Floor 2, The Regent Building, 33 Cathedral Square, Christchurch 8011
PO Box 13831, Christchurch 8141
DX Box WX10009 Christchurch
p + 64 3 379 0037
jo.appleyard@al.nz / tallulah.parker@al.nz

**anderson
lloyd.**

Introduction

- 1 This Joint Witness Statement (JWS) responds to Minute 3 in relation to **wastewater** and **water supply**.
- 2 The caucusing took place on 13th May 2026, via teleconference.
- 3 Attendees at the caucusing were:
 - (a) Michele McDonald – Christchurch City Council (MM)
 - (b) Andrew Hall – Davie Lovell-Smith on behalf of the applicant (AH)

Code of conduct

- 4 Although this is not an Environment Court hearing, in preparing this statement the experts have read and understood the Code of Conduct for Expert Witnesses included in the Environment Court Practice Note 2023 and agree to comply with it.

Areas of agreement

- 5 MM and AH agree that the Site can be serviced for water supply by establishing new treated water sources on site and extending the water networks to Spencerville.
- 6 MM and AH agree that the Site can be serviced for wastewater by installing a Local Pressure Sewer system with a connection to Spencerville. The wastewater infrastructure in Spencerville will require some maintenance and some targeted wastewater upgrades.
- 7 All new infrastructure work, maintenance and upgrades are to be funded by the Proponent, designed and constructed in accordance with the relevant engineering standards, minimum design requirements and Infrastructure Provider Agreements and vested in Council where appropriate.
- 8 MM and AH have read submissions relating to the wastewater and water supply and agree that there has been no expert evidence provided in support of these submissions.
- 9 MM and AH have read the supporting document provided by Mr Messerly on "Wastewater Technical Review" on behalf of the Ouruhia Residents Group. MM and AH agree that his concerns are without basis. The documents provided by Mr Messerly do not change the expert opinions expressed by MM and AH above.

Areas of partial agreement

10 MM and AH have no partial agreements or disagreements.

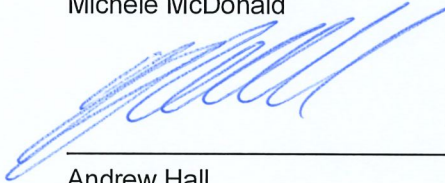
Areas of disagreement

11 MM and AH have no disagreements.

Dated this 13th May 2026



Michele McDonald



Andrew Hall